

Aid Transparency Index: technical review proposal

Comment	Response
General comments	
<p>We do note that coverage (data available in proportion to a donor's portfolio) is not reflected in the Technical Review Proposal, although we believe it is a key component to measure the transparency of an organisation. [Redacted] as a large donor, has made it a priority to provide information on all of our activities whenever possible. We believe that such transparency efforts are not documented and accessed in the ATI as it stands. This would also mean that a donor not engaging in such transparency policies can score highly on the ATI, but only publishing a small part of their entire portfolio. We would highly advocate that this suggestion be considered in this final stage of the review process.</p>	<p>From the consultation meetings we held in December/January, there was a broad recognition that it is difficult to measure and assess coverage due to the different business models and approaches to reporting among the organisations in the Index. We concluded that we will follow an iterative approach to assessing coverage. We will carry out investigation into the organisations included in the index, using OECD CRS data, and other methods for those organisations that don't report to the OECD, or which report different data to OECD and IATI. We will then follow up on any cases where it appears that organisations have low coverage in IATI, and get in touch with the donors in question to seek further explanations as to what they do or don't publish in their IATI data. If we conclude that an organisation is under-reporting, we will take action such as flagging the issue (as we did with some of the regional development banks in the 2020 Index), or excluding an organisation from the Index in cases where visibility is excessively low. We remain open to</p>

	<p>suggestions for how such an indicator would work/measure coverage, as we agree it is an important consideration.</p>
<p>The purpose of the change in methodology of the Aid Transparency Index (ATI) is to 'ensure the Index continues to reflect the areas of aid transparency that are most important for those using the data, particularly stakeholders in the global south'. This also reflects the IATI strategy as published in last year's strategy paper.</p> <p>To make the ATI fit for purpose there are a two key areas which are critical to address:</p> <ul style="list-style-type: none"> - Development and humanitarian activities take place in a complex network of thousands of organisations; - different organisations have different roles in the network. E.g. the role of a bilateral donor is quite different from the role of a local NGO. <p>The current scope of the ATI is limited to less than 50 bilateral and multilateral organisations. The ATI focusses in other words on the large providers. These organisations are only a very small part of the total IATI network. This means that in the current situation there are no incentives in the ATI for other stakeholders, such as international NGO's, to improve the usability of their IATI data.</p> <p>For this reason I would suggest that the ATI focusses on all stakeholders and gives special attention to the transparency of the connections between activities of all the organisations. Only in this way the connection on the data-level can be made between stakeholders in the global south to the multilateral and bilateral donors. This could address both upward and downward accountability, increasing the predictability of the funding on all levels, allowing local data users to see relations between programs, and making clear which results are being achieved where for whom.</p> <p>Of course such an increase in the scope of the ATI takes time and effort. When all stakeholders are to be included, the production of the ATI should be largely</p>	<p>Thank you for your comment – the changes proposed here are beyond the scope of the 2021 Index methodology review, however, we have introduced the Networked data indicator which is a move in the direction of greater networking of IATI data. We will consider the other suggestions here as we continue to develop the index in coming years.</p>

<p>automated. This is not done in six months. Nonetheless, the current revision of the ATI methodology could be the first step in expanding the width and depth of the ATI. Special care in that respect must be given to the measurement of the connectivity among all stakeholders. To be meaningful from the data usability point of view this connectivity should be monitored on the transaction level with the explicit use of IATI identifiers to refer back to funding activities.</p>	
<p>Networked data</p>	
<p>Support with limitations or exclusions provisions for redactions</p> <ul style="list-style-type: none"> • [Redacted] supports the spirit of this indicator, however, would strongly encourage PWFY to allow for exclusions and limitations in the scoring provisions for redacted data. There are viable reasons why certain implementer names and details are redacted in the dataset. Under [Redacted] policy and law, these redaction provisions are allowed. The [Redacted] policies and laws which allow for these redactions include the [Redacted] and [Redacted] • [Redacted] provides information on these awards; however, the name and other identifying features of the implementing organization are redacted for security reasons (e.g. women’s rights programming in Afghanistan). • [Redacted] strongly encourages PWYF to identify exclusions for standard redactions where there are existing [Redacted] laws and mandates permitting these redactions for the security of implementing partners. Sampling should also take this into account. 	<p>Security redactions will be accepted when these are limited in scope and application and when the justification for redactions is explained in the organisation’s exclusions policy.</p>
<p>[Redacted] recognises the benefits of such indicator. However, from an operational point of view there is a challenge for all big publishers regarding the large amounts of activities, and there is a high risk that a donor is assessed for the behaviour of its implementing partners. In this regards, [Redacted] has the following questions:</p> <ul style="list-style-type: none"> • Could PWYF confirm that it is not requested to indicate the IATI Identifier of the participating organisation and that the name is sufficient to score in this indicator? • For organisations using hierarchies, this indicator should only be tested at the lowest level of the hierarchy. This is a more general issue, as many indicators in a 	<p>The new test will be a two part test – part of the points will be awarded for providing the implementer name, and part will be awarded for providing organisation references for participating organisations (in any role).</p> <p>As we design the test we will review how it interacts with activity hierarchies.</p>

<p>hierarchy only apply to the lowest level. Could PWYF confirm that it will be feasible to decide at which level of the hierarchy the indicator will be tested?</p> <ul style="list-style-type: none"> • Could PWYF explain what is meant by “Generic or non-specific organisation references (such as “Developing country-based NGO” or “Multilateral Organisations”) will not be accepted since these do not allow networking of organisations”? • Could PWYF confirm that this indicator will not be included in the ATI 2022? 	<p>Generic organisation references do not indicate which specific organisation is participating in the activity, they only tell you what type of organisation is participating. The point of this indicator is to encourage publication of data that allows users to map networks of aid delivery relationships.</p> <p>We plan to implement this indicator in the 2022 Index.</p>
<p>The IATI Standard foresees the identification of the organisation that is principally responsible for delivering each activity.</p> <p>PWYF proposes to assess not only whether or not publishers identify the implementing organisation as foreseen under the IATI Standard, but also if they do so through specific reference numbers.</p> <p>[Redacted] publishes the name of the organisations responsible for implementing each activity. It is thus fully transparent in this regard.</p> <p>However, [Redacted] cannot publish this information in the specific format proposed, notably because most (if not all) implementing organisations do not have the requested identifying codes.</p> <p>Publishers that transparently publish information should not be scored down because the information is not available in the specific format proposed. We therefore believe that publishers should receive the full score if they publish the names of implementing organisations.</p>	<p>It is highly likely that this organisation will not be scored for the organisation reference part of this test since government and private sector implementers will be excluded. This is because there are currently no accepted references for these types of organisation. We will look to change this if accepted references are agreed by the IATI community in the future.</p>
<p>As we see it, having a narrative for participating role 4 already gives a good idea on the participating organization. Even though we understand that a unique code bears advantages with regards to automated analysis and mapping, we also would like to</p>	<p>Organisations should use existing references where these have been created and used previously. If no reference</p>

<p>raise the issue of implementation: IATI Org IDs have to be created manually by each publisher for each participating organization. As we understand it, there is no central register, where for instance, all ever created codes are collected. This means that different IATI ID (s) might be created by different donors per organization. We are worried that this is rather confusing instead of increasing transparency. Moreover, if the implementing organization is registered with IATI and already has a IATI Org ID, it is still necessary to manually check this and add the code to the own IATI file. All in all, this leads to a high investment of capacities and there is no automated solution for this. We think this IATI-element might need some reconsideration on an easier way to generate such codes before it is introduced into the ATI.</p>	<p>currently exists, a reference can be created using the recommended approach (often combining a prefix and official registration number). Guidance is available on the IATI website. To pass the Index test references must use a prefix from the list of valid prefixes for IATI organisation references or be on the list of IATI publishers.</p>
<p>As raised during consultation process, organization disclose policy does not permit releasing the names of downstream Implementing Partners, due to security reasons. [Redacted] has already published the types of IPs. We strongly suggest revising/loosening this requirement in order to fairly assess all organizations.</p>	<p>We can only accept security redactions when these are limited in scope and application. Organisations that don't publish a type of information across their activities will not be able to score transparency points for that indicator.</p>
<p>By only measuring the 'Participating org' for assessing the level of networking we are missing a major opportunity to boost network information in IATI. By encouraging publishers to use the providing-activity-id as a way to link up activities, you can tackle for instance the double counting problem. It would accountability through the chain of related actors, making IATI data fit to hold both donors and NGO's accountable by the stakeholder at the end of the delivery chain (e.g. actors in in the global south).</p>	<p>We explored the possibility of an indicator to assess activity linking in IATI, however there were a number of technical barriers to applying this in the Index at this time. It is something we are looking at for future iterations of the Index.</p>
<p>This is a development that is relevant now, and the ATI could give it an additional push. And it is *the* element that will tell local data users if an activity is stands 'by itself' or is funded through a second activity in the same country.</p>	<p>No response required.</p>
<p>Please consider excluding partner names that have been redacted for security purposes from the analysis. [Redacted] supports the spirit of this indicator and includes these data in IATI when available. However, there are an increasing number of countries where the release of partner names - especially local partners - may put partners, programs, or beneficiaries at risk and, therefore, releasing detail about the</p>	<p>Security redactions will be accepted when these are limited in scope and application and when the justification for redactions is explained in the organisation's exclusions policy.</p>

<p>partner is redacted for security purposes. Please consider this rationale in the analysis.</p>	
<p>Does this mean that EITHER the narrative OR the reference is acceptable? It is important that the reference NOT be a required element for a positive score on this item given that there is not a standard reference available for many implementing partners.</p>	<p>Organisations should use existing references where these have been created and used previously. If no reference currently exists, a reference can be created using the recommended approach (often combining a prefix and official registration number). Guidance is available on the IATI website. To pass the Index test references must use a prefix from the list of valid prefixes for IATI organisation references or be on the list of IATI publishers.</p>
<p>Will you also check the publisher is not only referring to itself? There are publishers who copy their own reference throughout the dataset.</p>	<p>Yes, self-references will not be counted in this test.</p>
<p>The database of org-id is not comprehensive (in the PHI alone, only one agency [SEC] is registered). While there is a mechanism to “register” unlisted agencies in the org-id, this will be an undue burden to the reporting organization [Redacted].</p> <p>It is suggested to implement the org-references indicator when there is already a comprehensive database to which reporters may refer.</p>	<p>It is highly likely that this organisation will not be scored for the organisation reference part of this test since government and private sector implementers will be excluded. This is because there are currently no accepted references for these types of organisation. We will look to change this if accepted references are agreed by the IATI community in the future.</p>
<p>what if the organisation is not on the list of valid prefixes?</p>	<p>Organisations should use existing references where these have been created and used previously. If no reference currently exists, a reference can be created using the recommended approach (often combining a prefix and official registration number). Guidance is available on the IATI</p>

	<p>website. To pass the Index test references must use a prefix from the list of valid prefixes for IATI organisation references or be on the list of IATI publishers.</p>
<p>There will be many organizations who will not exclusively work with partner country government or PSI's. Therefore it would be better instead to exclude on activities the activity level from the calculations, and not whole organizations.</p> <p>Please also measure the use of valid references to other (funding) organizations on the transaction level. What is measured gets done. And this metric would than better align with the overall strategic plan for IATI for 2020-2025</p> <p>Which brings me to another topic: the ATI is now limited to a very small subset of the total IATI publisher population. In order to use the ATI to monitor progress to the IATI strategic goals, all publishers should be represented in the index. This would be possible if the index was fully automated, with an in depth manual assessment (as is now the case) for a limited number of publishes.</p>	<p>Unfortunately it won't be possible to exclude individual activities from the test based on implementation through government or private sector partners. We will, however, exclude budget support aid types which will likely exclude many of the projects implemented through governments. We don't think this will affect scores significantly.</p> <p>We explored the possibility of an indicator to assess activity linking in IATI, however there were a number of technical barriers to applying this in the Index at this time. It is something we are looking at for future iterations of the Index.</p>
<p>Publishing references is a lot more work than simply publishing the name of the implementing organization. Perhaps the relative weight of each component should be reconsidered.</p>	<p>The component weights is based on the importance of the data to users – transparency around names of implementing partners is particularly important to know who is operating, where, and who donors are working with. We may adjust these weightings in future iterations of the Index.</p>
<p>Conditions indicator</p>	
<p>[Redacted] does not support the inclusion of this indicator in the ATI. The information captured in the conditions field is duplicative of information found in contracts or</p>	<p>If the conditions are contained in a contract, this can be indicated by tagging</p>

<p>other narrative fields. Additionally, some organizations do not have activity specific conditions or conditions are found in the contract. Otherwise, any conditions could be country specific or covered under a blanket policy.</p> <p>IATI guidance states that "If a condition relates to the whole organisation, such as organisation-wide terms and conditions, it should not be reported within an activity." [Redacted] questions whether the ATI encouraging documents stating a condition does not exist for a specific activity will just create noise in the data and conflict with the Standard guidance.</p>	<p>the contract with the A04 conditions document code.</p> <p>It is very unusual for an activity to have no conditions – these can be benchmarks, priors, deliverables, or policy conditions. If an activity has none of these it should be stated that the activity is not subject to any conditions. Activities such as core contributions to multilaterals and other core contributions that generally do not have conditions will be excluded from this test. The test will focus on government budget support and project type interventions.</p> <p>Documents stating a condition does not exist for a specific activity are not encouraged. This indicator will assess whether activity specific terms and conditions have been published. Templates of standard terms and conditions that are not activity specific will not be sufficient to pass this test.</p>
<p>[Redacted] supports [Redacted] comment and need more clarifications on what is expected. Would a document related to the activity and mentioning the conditions suffice?</p>	<p>Yes, a document outlining the conditions of the project would suffice for this test. It should be tagged with the A04 conditions document code.</p>
<p>Clarification is sought on the expected raw data or narrative under conditions. The actual conditions are already set forth as standard or particular covenants in the Conditions document. Requiring these in the XML files will be duplication of effort.</p>	<p>There would be no need to publish both, either a document or data will be accepted for the test.</p>
<p>We appreciate that Policy conditions would be accepted as a form of loan conditions in the new assessment model. [Redacted] requires its clients, as applicable, to apply</p>	<p>In order to fulfil the criteria for this indicator all of the conditions of the project would</p>

<p>[Redacted] to manage environmental and social risks and impacts in order to secure [Redacted] financing – which are loan conditions. We disclose a description of the main environmental and social risks and impacts of the project and key measures identified to mitigate those risks and impacts, specifying any supplemental actions that will need to be implemented to undertake the project in a manner consistent with [Redacted].</p> <p>As we have communicated in the past, the amount of redaction required to remove commercially sensitive information from technical loan documents of its private sector clients would not result in meaningful information, and we maintain that these types of Conditions should not be assessed in addition to the more meaningful ones we disclose.</p>	<p>need to be published. Ideally the contract should be disclosed in full and tagged with both the contract and conditions document codes. Where redactions are made to hide commercially sensitive information, this is accepted, but loan conditions such as the tenor and interest rate of the loan should be disclosed. Special terms and conditions such as policy conditions should also be disclosed.</p>
<p>The IATI Standard asks publishers to declare any conditions or specific terms that are attached to their activities.</p> <p>The [Redacted] publishes whether or not environmental and social (E&S) conditions apply to each operation, the template contractual clauses on environmental matters, as well as information on the E&S aspects of the projects it finances, including specific conditions as appropriate.</p> <p>PWYF proposes that DFIs and IFIs should publish “<i>loan repayment conditions or special terms and conditions. In cases where the loan repayment terms are considered commercially sensitive, this information can be redacted. The reason for the redactions needs to be explicitly stated in detail and must clarify why the information is commercially sensitive and would cause material and direct harm if published.</i>” Templates for general terms and conditions would not be accepted.</p> <p>The proposal does not define “loan repayment conditions or special terms and conditions”. If interpreted broadly, this reference would cover information that is likely to be commercially sensitive in most cases.</p> <p>This being the case, the significant costs that this proposal would impose on publishers (in terms of human resources and relationships with counterparts) would not be justified by proportionate improvements in transparency. This proposal, which</p>	<p>In order to fulfil the criteria for this indicator all of the conditions of the project would need to be published. Ideally the contract should be disclosed in full and tagged with both the contract and conditions document codes. Where redactions are made to hide commercially sensitive information, this is accepted, but loan conditions such as the tenor and interest rate of the loan should be disclosed. Special terms and conditions such as policy conditions should also be disclosed.</p>

<p>runs contrary to the above-mentioned IATI best practice, would rather subtract limited resources from more useful activities and alienate counterparts.</p> <p>We recommend that PWYF should focus on E&S conditions, which are typically of higher public interest, instead of terms and conditions on other matters, which are typically commercially sensitive and not of public interest. Moreover, it should be accepted that the publication of project-specific E&S conditions is not relevant for all projects (also see the comments below on pre-project impact appraisals).</p>	
<p>Not Supported</p> <ul style="list-style-type: none"> • [Redacted] foreign assistance includes “project-type interventions” which typically do not have further conditions outside of what is listed in the contractual and/or grant documents with implementing partners. • Given the above, this indicator appears to be duplicative of the contract indicator, as the information would not be materially different from what is provided in the contracts. • IATI guidance states that, “if a condition relates to the whole organisation, such as organisation-wide terms and conditions, it should not be reported within an activity.” [Redacted] questions whether the ATI encouraging documents stating a condition does not exist for a specific activity will conflict with the standard guidance. 	<p>If the conditions are contained in a contract, this can be indicated by tagging the contract with the A04 conditions document code.</p> <p>It is very unusual for an activity to have no conditions – these can be benchmarks, priors, deliverables, or policy conditions. If an activity has none of these it should be stated that the activity is not subject to any conditions. Activities such as core contributions to multilaterals that do not have conditions will be excluded from this test. The test will focus on government budget support and project type interventions.</p>
<p>We suggest giving examples on what documents are expected in this indicator. Moreover, we consider it important to substantiate, how PWYF will assess the comprehensiveness of conditions disclosure.</p>	<p>We will provide examples of accepted conditions documents upon request. Organisations should publish comprehensive sets of conditions for projects, however, we are not able to substantiate whether declared conditions are comprehensive.</p>

<ul style="list-style-type: none"> • In its recent consultation paper, PWYF had proposed to drop this indicator. [Redacted] had favoured this proposal, in particular with reference to Budget Support. Could PWYF explain why it chose to reconsider it? • [Redacted] uses a hierarchy system to publish information at activity level. Conditions at activity level two are indicated in the specific contract related to the activity, signed with the implementing partner. However, contracts cannot be published for confidentiality reasons. Could PWYF confirm that it is possible to request an exemption for the application of such indicators at activity level two and limit it to activities level one (commitments)? • Based on the following sentence “For private foundations and humanitarian agencies, statements setting out what the grant can be spent on are accepted”, can it be assumed that the humanitarian implementation plan (HIP) defining the activities that can be financed in a particular world region/country is sufficient to fulfil this requirement? Indeed, grants are awarded to organisations only, if their proposal is compliant with the objectives and conditions set up in the HIP and the final payment is conditioned to the fulfilment of what is proposed. Moreover, in humanitarian context, disclosing conditions at contract level often raises security issue 	<p>We had considered dropping the Conditions indicator as part of the methodology review, however, during our stakeholder consultations data users emphasised the importance of publication of conditions for those monitoring aid projects to know the full impact of aid operations in a country and for partner governments to track obligations and conditions that they are required to meet. This was also a commitment made in the Accra Agenda for Action (§25b).</p> <p>We will assess the hierarchy level at which these documents should be published and confirm with each organisation.</p> <p>HIPs are accepted for this indicator.</p>
<p>Sampling</p>	
<p>The change in the sample size is supported.</p> <p>However, the lower limit of 10 does not recognize any effort of publication of available data. (e.g., results/evaluation document may not always be available for all projects)</p>	<p>The sampling is only carried out on published documents so those activities with no document published will not be picked up in the sampling.</p>
<p>[Redacted] is concerned that a sample size of 20 results in a margin of error of ~22%. This means that PWFY cannot be confident in the accuracy of a significant portion of results around the pass/fail threshold. We note that PWFY recognizes this issue and attempts to mitigate it by only failing an indicator if PWFY is “confident that a third or more of that publisher’s data would not pass [the] quality tests”. However, [Redacted] would prefer a bigger sampling size, generating a more robust result that would rely less on mitigation processes that are hard to verify. Alternatively, we’d recommend caveating that the surveys are biased towards “pass” results under the</p>	<p>We are not able to increase the sample size or do the sampling in a non-manual way. We have added a note to the technical paper stating that the threshold for passing sampling is intentionally set at a relatively low level.</p>

<p>current methodology, and/or that PWYF consider for future surveys a less manual method for collecting these survey results so a larger sample could be surveyed.</p>	<p>We also considered increasing the threshold for passing sampling to 75% (15/20). For a 15/20 results the confidence interval for the true population pass rate is between 56% and 94%. We have been reluctant to raise the pass rate since it will likely have a significant impact on scores in the 2022 Index. We will consider raising the threshold for subsequent Indexes to continue to raise the bar as data quality improves over time.</p>
<p>[Redacted] does support this change, however limiting the sampling to 12 is a bit unfair when an organisation reports for example on around 1000 projects.</p>	<p>The calculations in the paper are based on an infinite number of activities, so would be the same for 1,000 or 100,000 activities. The confidence levels do start to increase significantly when there are 500 activities or less, however.</p>
<p>PWYF proposes to reduce the size of the sample to assess in order to score relevant indicators.</p> <p>We appreciate that limited resources should be used efficiently. At the same time, the sample size can have a significant impact on Index scores, which are PWYF's flagship outputs and express a judgement about publishers' transparency. It should therefore be a priority for PWYF to ensure a high level of confidence in and credibility of the assigned scores.</p> <p>Whether or not this proposal is adopted, we recommend that PWYF should take publishers' feedback on the first round of sampling in due account to determine final scores. When PWYF disagrees with the feedback, it should provide a detailed explanation to the publisher. Index scores should not be an end in themselves but the means to help publishers understand the issues found and how they could be</p>	<p>Thank you for your input. For the IATI data quality sampling we have used a 95% confidence interval which is the conventional confidence level for this type of random sampling approach.</p> <p>We will provide feedback following the first round of sampling with details of why the data failed sampling and, where appropriate, suggestions of how this can be improved.</p>

<p>addressed. Finally, PWYF should transparently make available the confidence interval of each score.</p>	
<ul style="list-style-type: none"> • It is not clear what is the added value of reducing the sampling. This proposal can have a significant impact on the publisher's overall score. Therefore, [Redacted] discourages the reduction of sampling from 20 to 12, also for statistical reasons; it is questionable to determine the overall score of one indicator on the basis of 12 activities over thousands published. Indeed, some indicators were failed in previous editions just because of a result of the manual sampling; although [Redacted] published relevant information, the manual selection did not show it. • [Redacted] would like to understand better what happens, when an indicator fails the first sampling round, but passes the final sampling round. Would this affect the overall score for that specific indicator? • It is also of utmost importance to clearly specify the criteria for the selection of the samples. 	<p>To clarify: the first round of sampling does not affect the final Index scores. The purpose of the first round of sampling is to provide feedback and help organisations understand what improvements they should make to their data in order to improve their data quality before the second round of data collection.</p> <p>The final Index scores are based on the second round of data collection including the second round of sampling. We are proposing to reduce the number of samples in the first round to 12 and to maintain 20 samples in the second round.</p> <p>For each sampled indicator the samples are selected randomly from all of the activities for which data was found.</p>
<p>Not quite following the logic. The margin of error (22%) is the degree of error in results received from random sampling. In this example the range would be (0.23, 0.67) (0.45 plus or minus the margin of error). (0.23, 0.67) is a wide range, and it also cross the half point (0.50), meaning both failing or not failing is possible (within margin of error).</p> <p>Reducing the sample size further from 20 to 12 would cause even higher degree of error.</p>	<p>We are only proposing to reduce the sample size to 12 for the first round of sampling, not the second round.</p> <p>The margin of error is quite wide, and is biased in favour of passing sampling, given the significant impact on scores of an indicator failing sampling (all IATI points for that indicator are lost).</p>
<p>At this point, we would like to re-emphasize our request from our last comments:</p>	<p>Thank you for your feedback. We will ensure you are provided with a clear</p>

<p>[Redacted] would like to ask for more transparency around the calculation of the points, throughout the sampling, and, more generally, throughout the data collection process. During the last ATI-round, it has often been impossible for us to understand the points published in the [Redacted] dashboards. We could not tell whether the points were including sampling results or automated checks or manual checks. Moreover, it was impossible to understand, how the points are actually composed, and we would really like to see how a grade has been calculated (e.g. for the implementer indicator of [Redacted], as of 11.05.20 in the tracker-dashboard): was there data missing? Or did some data fail the quality tests -> which quality criteria are set by PWYF and where did the data fail them? Unfortunately, we find the Technical Paper leaves room for interpretation and is sometimes confusing. For instance, we think the following explanation on sampling and manual checks is difficult to follow and would suggest a re-phrasing: "A minimum of ten of these samples (the relevant project document or data) need to pass sampling to be scored as IATI data. If less than 20 activities passed the indicator, then all of the relevant documents or data are reviewed and at least half of these must be approved in order to be scored as IATI data." p,8. Throughout the last ATI, it was impossible to understand where the data collection process stands and how we could proceed to improve our data. We would strongly recommend creating more transparency around data collection and changes of points per indicator. E.g. it would be very helpful, if the scores indicated were attributed to the respective data collection step / process.</p>	<p>explanation of the data collection process and what results you can expect when prior to the next Aid Transparency Index assessment.</p> <p>We have re-drafted the section of the technical paper you referred to here.</p>
<p>Given the small sample size as compared to the number of activities many organizations publish, we recommend complementing this tailored analysis by organization with general information or tips on the most common issues with each indicator so that organizations could also review that information and make data enhancements to address issues that perhaps would not be identified for their organization with the small sample.</p>	<p>Thank you for this suggestion, we will see if and how we can implement this in the next Index assessment process.</p>
<p>For scoring on sub-national locations it is i.m.o. important to distinguish the place of the publisher in the the network. Bilateral donors who work with primarily with intermediate organizations (e.g. multilaterals, iNGO's), will very often not know or earmark their funding to specific sub-national locations. Local NGO's on the other hand, often will know the sub-national locations.</p>	<p>At present we expect the donor organisation to provide location information about their projects and score organisations on this basis. If data networking allows in the future we may</p>

	look to also assess location publication by implementing partners.
Scoring structure/accessibility criteria	
<p>In the 2020 Index, we were happy to see that footnotes to the Index identified when an institution’s sovereign and non-sovereign portfolios were available and reviewed. However, we are disappointed that the proposed indicator still does not score or assess how much of a publisher’s portfolio isn’t reported. This had been discussed as a “visibility/coverage” indicator during the earlier consultation phases, and in our view should be tied to accessibility.</p> <p>As more publishers work to disclose their private sector activities, we would encourage PWYF to go a step further and factor the sovereign/non-sovereign portfolio breakdown in the ranking, or perhaps break them out so that external stakeholders can more easily compare the type of activities and the relative transparency around them. If not, an indicator such as “Disbursements”, which is rarely, if ever, disclosed for private sector activities, is likely to greatly skew the score of those institutions with mixed portfolios. If not disentangled, the rankings may continue to reward institutions who disclose more regarding their public sector portfolios (even though the public share of their portfolio may be declining or disproportionate).</p>	Thank you for this feedback.
<p>We appreciate PWFY’s acknowledgement that publishers can receive a high Index score by publishing little information under the IATI Standard rather than a lot of information and documents in other formats (e.g. on their website, as PDF documents, etc.).</p> <p>PWYF proposes to continue scoring publishers depending on the format of the publications, maintaining the low scores for human-readable web and PDF publications and high (though slightly reduced) scores for publications in machine-readable format.</p>	Higher scores are awarded for publication in machine readable, open, standardised and centralised formats since these make transparency data more useable, accessible and comparable, all important aspects of aid transparency.

<p>Whilst [Redacted] publishes information on all of its operations outside [Redacted] according to the IATI Standard, we consider that the format of publications is not an indicator of transparency. Therefore, we recommend that the Index should concentrate on scoring transparency and appropriately reward publications in human-readable formats. Separate indicators, not contributing to the overall Index score, could be created to reflect whether or not publications are in the desired formats.</p>	
<ul style="list-style-type: none"> • [Redacted] agrees with placing more emphasis on the comprehensiveness of data. • However, [Redacted] also recognises that major structural elements of organisations affect the information available for a donor to publish. Regarding the scoring for the forward-looking budget indicators at the organisation level, the budgetary timeframes of each donor has to be taken into account while assessing how forward-looking the published information is. At the beginning of the [Redacted] provides up to 7 years forward looking information but at its end such time-span is not available. Moreover, in the Humanitarian sector, disaggregated budgets are also not always available due to the short-term nature of projects, where funds are allocated based on needs. 	<p>We are unable to tailor the assessment to the specific circumstances of each organisation assessed in the Index so when information is not available an organisation may lose points in the Index regardless of the circumstantial reason for this.</p>
<p>Agree with the rationale, just want confirm that IATI format should always score higher than the non-IATI format at the same level of comprehensiveness of the data</p>	<p>Yes, this is the case.</p>
<p>With regards to adapting the scoring approach, we have serious concerns on how it may affect our points. We understand that it would help disincentivize organizations to “game” scores by simply publishing small amounts of IATI-data to get 50 points. Yet, as we understand it from this proposal, it will also mean that the distribution of points per indicator with non-comprehensive IATI data will change. For instance: for an indicator with 80% of “good” IATI data, organizations would lose points as compared to the old scoring approach. We are afraid that this effect, if added up across indicators, might have a noticeable effect on the overall score. Thus, efforts that we do to improve our data or to include new data, would eventually not be displayed in the final score, which we find highly discouraging. We are very worried that this will eventually disrupt the comparability of ATI scores over the past years.</p>	<p>We modelled the change based on the data from the 2020 Index and the impact on overall scores is quite small. Rather than being a static assessment, the Aid Transparency Index aims to incrementally raise the bar for aid transparency across iterations. This is done gradually to allow comparability across Indexes. Note that the change applies across organisations so with no changes to organisations’ transparency, rankings and relative scores will be consistent. Improvements to</p>

<p>We strongly advise PWYF to present clear evidence on the impact of this proposal on the scores of the ranked organizations before deciding on this matter.</p> <p>In this context, we would also like to re-emphasize the question on how exactly it is determined whether the published data is comprehensive? For [Redacted] and [Redacted], we have had an issue with evaluations: [Redacted] do not conduct evaluations for every single project. Yet every evaluation realized is made available in the IATI activity file on project level - meaning our data is de facto comprehensive. However, this means that logically not every activity is published with an evaluation link. This was sanctioned in the last ATI round and we would be keen to see a fairer approach to this.</p> <p>Another reflection on the question, which projects are analyzed throughout the ATI. Naturally, for some indicators, there are more data available for recent and still ongoing projects, where there is a project manager and team in charge. When projects have ended several years ago, it is rather difficult to generate new data (exceptions would be evaluations or results-data). We also think that with IATI, one central aim has always been to focus on drawing a picture of the current portfolio, in contrast to statistical, “historical” data such as CRS-data.</p> <p>For the sake of transparency, we keep projects that have ended in our IATI file and they are published monthly. However, for the ATI, we think that it would make sense to focus on rather recent projects for some indicators, e.g. by setting a limit end date (“ATI does not include projects that have ended before 20XX”).</p>	<p>transparency and data would only fail to register if these are the same or less than the points lost from the scoring method change, which is quite small.</p> <p>For evaluations, we only expect these for activities that have closed up to a year before the data collection date. Other activities for which evaluations are published are also accepted, so mid-term or annual evaluations can also count towards the final scores for this indicator.</p> <p>Only current data is assessed in the Index – this includes active projects or projects that closed within the last 12 months before the assessment date. In the case of the 2022 Index this will cover projects active or closing after March 2021.</p>
<p>Would a webpage which changes once each year to update results information be regarded as a static webpage? Wouldn't it be better to just mention here 'if published on a webpage'?</p>	<p>Yes, we have made this change in the Technical Paper.</p>
<p>Pre-project impact appraisals</p>	
<p>[Redacted] supports including pre-project impact appraisal, but limiting the number of sectors where these are attributed. Realistically, these may not be completed in specific sectors or projects for practical or policy reasons. Additionally, [Redacted] is concerned with the language noting a document explaining why the impact appraisal</p>	<p>The Pre-project impact appraisals indicator only reviews project-type interventions and does not include many of the IATI aid types in the test (see the Technical Paper Annex</p>

<p>was not completed “for a particular project or program” as this language excludes blanket policy exclusions that an organization may have.</p>	<p>2 for a full list of the excluded aid types). We cannot make further exclusions for this indicator and cannot accept blanket exclusion policies.</p>
<p>[Redacted] supports this new methodology</p>	
<p>[Redacted] publishes Environmental and Social Data Sheets (ESDS) reflecting the E&S appraisal of each relevant project, as well as a number of other E&S documents, on its Public Register.</p> <p>Nevertheless, in the 2020 Index, PWYF scored the [Redacted] “0” on this indicator because the hyperlinks included in our IATI data had not yet been updated following improvements to the Public Register. Whilst this technical issue has since been resolved, it illustrates that the Index does not always reflect the true transparency of an organisation.</p> <p>PWYF proposes to modify the definition of this indicator by referring to social and human rights (in addition to environmental) impact assessments and specifying that <i>“For DFI projects categorised as high-risk (environmental or social risk category A or equivalent) the full impact appraisal document(s) should be published. A summary of the appraisal will not be sufficient.”</i> Moreover, PWYF proposes that <i>“If an official internal procedure has concluded that a pre-project impact appraisal is not necessary for a particular project or programme, official documentation confirming this will be accepted in lieu of an appraisal document.”</i></p> <p>We note that not all projects require a pre-project impact appraisal and not all publishers implement the foreseen project categorisation. It is disproportionate to require the publication of “official documentation” confirming that a pre-project impact appraisal is not necessary. This “official documentation” may not necessarily exist for all projects, be produced or held by the publisher, or be available at the time that project-related information is published and assessed by PWYF.</p> <p>We consider that, as explained above, [Redacted] is highly transparent about its appraisal of the E&S aspects of the projects that it finances and recommend ensuring that the assigned scores reflect the real transparency of each publisher, without being hampered by spurious elements (e.g. an excessively narrow or formalistic interpretation of the indicators).</p>	<p>As well as publishing data, we expect organisations to make their data easily available and accessible. The links included in this organisation’s IATI data were broken which meant we could not find the relevant documents.</p> <p>We would expect an organisation to publish the full EIA or ESIA for a project where a full assessment has been carried out.</p> <p>For projects where no EIA or ESIA was carried out an environmental and social summary will be sufficient to meet the criteria for this indicator.</p>

<p>Support with limitations</p> <ul style="list-style-type: none"> • [Redacted] supports including this indicator but limiting the number of sectors where these are attributed. Realistically, these assessments may not be completed in specific sectors or projects for practical or policy reasons. For example, a project focused on improving women’s rights in Afghanistan would not typically conduct a pre-project impact appraisal for holding training sessions. Limits could be established using DAC purpose codes. • For certain projects, [Redacted] may require risk assessments and monitoring and evaluation plans, however, these documents are typically considered pre-decisional and are not made public as they may contain sensitive implementer information (such as locations, etc.). PWYF notes that Humanitarian Implementation Plans (HIPs) are accepted, however, HIPs are Euro-centric and are not conducted universally by all donors globally. • Finally, [Redacted] is concerned with the language noting to provide a document explaining why the impact appraisal was not completed “for a particular project or program” as this language excludes blanket policy exclusions that an organization may already have in place. 	<p>The Pre-project impact appraisals indicator only reviews project-type interventions and does not include many of the IATI aid types in the test (see the Technical Paper Annex 2 for a full list of the excluded aid types). We cannot make further exclusions for this indicator and cannot accept blanket exclusion policies.</p> <p>Security redactions, of implementing partner names, for example, are accepted for this indicator.</p>
<ul style="list-style-type: none"> • The nature of [Redacted] often does not require impact assessment. When it does, for example in the case of work contracts for infrastructure projects, [Redacted] requests partner countries to conduct such assessments (mostly environmental impact assessments) before it signs the contract. Consequently, in principle impact assessments done by [Redacted] do not exist. Transparency criteria should not require publishers to produce new documents that are not judged useful in the particular context, but should assess the public accessibility of existing documents. • Moreover, [Redacted] would in some instances have to refer to confidential actions and interventions to provide documentation for this indicator. In this regard, we ask that this indicator will not penalise contracts, whereby such documents cannot be provided due to confidentiality obligations. 	<p>We suggest you look to publish the pre-project impact appraisals carried out by partner countries. If you are not able to publish any pre-project impact appraisals, you will not score points for this indicator.</p>
<p>In our view, the publication of summaries of pre project impact appraisals represents a good step towards increasing transparency around activities, which is why we are critical of the proposal to ignore them for some projects. [Redacted] has worked towards providing data on impact appraisals with summarized content via its</p>	<p>The requirement for full ESIA’s and EIA’s to be published refers to high risk projects (risk category A or equivalent) only.</p>

<p>transparency portal and in the IATI file. If the summaries of the impact appraisals are no longer counted, this publication would not be acknowledged by the ATI.</p>	
<p>Proposals not taken forward</p>	
<ul style="list-style-type: none"> • [Redacted] welcomes PWYF’s initial proposal to include the “Visibility and Coverage indicator”, as coverage should be a key element of any fair transparency assessment. Therefore, [Redacted] would advocate that PWYF reconsiders including this proposal to include an indicator measuring the proportion of a donor’s portfolio for which data is available. No reference has been made to this proposal in the technical review proposal. • [Redacted] recognises that not all donors can be compared to the OECD DAC CRS, which is why we propose an approach whereby the Visibility and Coverage indicator can be measured through comparing total amounts published in IATI with several verified and appropriate official sources. For example, this could be annual accounts for NGOs and approved operations budgets for International Organisations. 	<p>From the consultation meetings we held in December/January, there was a broad recognition that it is difficult to measure and assess coverage due to the different business models and approaches to reporting among the organisations in the Index. We concluded that we will follow an iterative approach to assessing coverage. We will carry out investigation into the organisations included in the index, using OECD CRS data, and other methods for those organisations that don’t report to the OECD, or which report different data to OECD and IATI. We will then follow up on any cases where it appears that organisations have low coverage in IATI, and get in touch with the donors in question to seek further explanations as to what they do or don’t publish in their IATI data. If we conclude that an organisation is under-reporting, we will take action such as flagging the issue (as we did with some of the regional development banks in the 2020 Index), or excluding an organisation from the Index in cases where visibility is excessively low. We remain open to suggestions for how such an indicator</p>

	would work/measure coverage, as we agree it is an important consideration.
We note that the Visibility/Coverage indicator that was not taken forward is not mentioned here, nor the rationale for not taking this forward.	See above.